

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

Julio Cesar Sanchez-Acosta, <i>et al.</i>)	
)	
<i>Petitioners-Plaintiffs,</i>)	
)	
v.)	
)	
Jefferson B. Sessions, III, <i>et al.</i>)	Civ. No.: 1:18-cv-00872-LO-IDD
)	
<i>Respondents-Defendants.</i>)	
)	
)	

PETITIONERS' MOTION FOR CLASS CERTIFICATION OR REPRESENTATIVE
HABEAS ACTION

Petitioners Julio Cesar Sanchez-Acosta, Khaled Najjar, Minase Tesfateon (“Petitioners”), by counsel and pursuant to Federal Rules of Civil Procedure 23, hereby respectfully submit this motion and move this Court for an order (1) certifying the proposed class; (2) appointing Petitioners as Class Representative for the proposed class; (3) appointing the undersigned as Class Counsel for the proposed class; and (4) ordering Respondents to identify class members to class counsel and notify class members of their status as class members within fifteen days.

This motion is based upon the First Amended Petition for Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2241 (Class Action Habeas Corpus Petition) (Dkt. No. 10), the accompanying memorandum of law and exhibits thereto, and such other evidence and argument as may be presented.

Date: July 26, 2018

Respectfully submitted,

Julio Cesar Sanchez Acosta, Khaled Najjar,
and Minase Taefateon

By Counsel

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Certificate of Service

I, the undersigned, hereby certify that on this date, July 26, 2018, I caused to be served a true copy of the Motion for Class Certification or Representative Habeas Action on all Respondents-Defendants by registered mail to the following addresses:

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